

**GOTLIB LAW**

September 29, 2023


*Via* ECF

The Honorable Lewis J. Liman  
United States District Court Judge  
U.S. District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

REQUEST GRANTED.

The Court approves the modification to Ms. Borges's bond as proposed permitting her to travel to and in the District of Connecticut.

9/29/2023 SO ORDERED.



LEWIS J. LIMAN  
United States District Judge

Re: *United States v. Raquel Moura Borges*, 21 Cr. 172 (LJL)

Dear Judge Liman:

I represent the defendant in the above-captioned matter. I write, with the consent of the government and the U.S. Pretrial Services Office ("Pretrial"), to respectfully request that the terms of Ms. Borges's bond be modified to permit her to travel to and in the District of Connecticut.

Ms. Borges was arrested on July 27, 2022, and charged with one count each of securities fraud, wire fraud, and investment adviser fraud. Ms. Borges was released on bond that same day. Ms. Borges's conditions of release include, among others, her travel restricted to the Southern and Eastern Districts of New York. Ms. Borges has complied with all the conditions of her pretrial release to date.

Ms. Borges currently resides in Scarsdale, NY, which borders the state of Connecticut. She has inadvertently crossed over into Connecticut while traveling in New York. While technically a violation of the terms of her bond, Pretrial understands that it was not an intentional violation and suggested the requested modification as one way to alleviate the problem. Additionally, there is a church that Ms. Borges would like to perform volunteer work at that is located in Connecticut. The requested modification would enable her to do so. The government (by Assistant U.S. Attorney Matthew Shahabian) consents to this request as does Pretrial Officer Courtney DeFeo.

Accordingly, we respectfully request that the Court modify the terms of Ms. Borges's pretrial release to permit her to travel to and in the District of Connecticut. I thank the Court for its consideration.

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Respectfully Submitted,

/s/

Valerie A. Gotlib

Cc: All counsel of record (*via* ECF)  
Courtney DeFeo, U.S. Pretrial Officer (*via* Email)